

## REMARKS

Claims 1-7 currently remain in the application. None of the claims is herein amended.

Regarding the matter of the drawings in Paragraph 1 of the Official Letter, applicant is submitting herewith a set of formal drawings in order to replace the informal drawings that were submitted earlier and accepted by the Examiner according to the Official Letter.

Claims 1-2 and 4-6 were rejected under 35 U.S.C. 102 as being anticipated by Cohen. Rejection of a claim under 35 U.S.C. 102 is justified only when each of the inventive elements in that claim is disclosed in one reference. Cohen does not disclose every inventive element in independent claim 1 or claim 4, and hence it is believed that the Examiner's rejection of claims 1 and 4 and the claims dependent therefrom is not justified and hence should be reversed. It is requested to note that claim 1 is a method claim including the step of:

selecting said edge pixels sequentially one edge pixel at a time and comparing the direction of said one edge pixel with the direction of another of said edge pixels at a specified distance from said one edge pixel to obtain a comparison result,

and that claim 4 is an apparatus claim related to an apparatus comprising:

comparing means for selecting said edge pixels sequentially one edge pixel at a time and comparing the direction of said one edge pixel with the direction of another of said edge pixels at a specified distance from said one edge pixel to obtain a comparison result,

while Cohen does not disclose any method including such a step, or any apparatus including such means.

Regarding the portion of claim 1 cited above, for example, the Examiner stated in said Official Letter (starting on the last line in page 2) that Cohen disclosed the comparison of the direction of one edge pixel with the direction of another edge pixel at a specified distance in column 19 between lines 29 and 67. Cohen does not say, however, what the Examiner claims as being said at least in column 19 between lines 29 and 67.

What Cohen describes in column 19 between lines 29 and 67 is the masking process of a foreground region and relates to the process for determining the opacity of the "edge zone model" containing (or "associated with" (column 19, line 2)) pixel  $P_i$  when pixel  $P_1$  is

neither in the foreground region (opacity = 1) or in the background region (opacity = 0) by obtaining the difference  $(r-p)$  between the position of pixel  $P_i$  (shown by vector  $r$ ) and the already determined edge zone position (shown by vector  $p$ ) and projecting this difference vector  $(r-p)$  onto the "edge zone direction"  $(\theta)$ . There seems to be no statement by Cohen regarding any direct comparison between the directions of two pixels which are separated by a specified distance.

Explained more in detail, Cohen does not seem to say anything either (1) about the comparison between the two directions of two pixels or (2) about two pixels separated by a specified distance. Regarding (1) above, it is to be noted that Cohen does not even say anything about the direction of pixel  $P_i$ . Considering the difference between two vectors and projecting this difference vector onto a certain direction is not the same as or even equivalent to comparing the direction of these two vectors. Regarding (2) above, Cohen talks about two position vectors but does not go any further to say anything about the distance between them, much less about the separation therebetween being of any "specified" distance.

At least for these two reasons, it should be concluded that Cohen failed to disclose every inventive element in claim 1, and also in claim 4. Since the approach to the problem is totally different, furthermore, it is believed that Cohen also fails to predicate the Examiner's rejection of these claims on the obviousness ground.

The secondary reference by Shibata cited by the Examiner also fails to describe these inventive elements which Cohen has been shown to fail to describe. Thus, it should be concluded that all claims dependent from claim 1 or 4 are also allowable in spite of these two cited references.

In summary, it is believed that the application is in condition for allowance.

Respectfully submitted,



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